ORIGINAL

25) 3/13/01

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICHARD C. WOJEWODZKI

v.

: No. 1:CV 01-285/

: (Judge Rambo) (: Civil Action

CONSOLIDATED FREIGHTWAYS, INC.

: Jury Trial Demanded

MOTION FOR EXTENSION OF TIME

AND NOW, TO WIT, comes the Plaintiff, by his attorneys, and makes the following Motion:

- 1. On April 19, 2002, Defendant filed a Motion for Summary Judgment.
- 2. Plaintiff's response to Defendant's Motion for Summary Judgment would be due on March 11, 2002.
- 3. Due to the illness and schedule of Lawrence S. Markowitz, Esquire, attorney for Plaintiff, Plaintiff believes that he would be unable to prepare an adequate response by March 11, 2002.
- 4. Based on the above, Plaintiff seeks an extension in which to file his opposition Brief to Summary Judgment until March 15, 2002.

WHEREFORE, Plaintiff prays for an extension of time in which to respond to Defendants' Motion for Summary Judgment until March 15, 2002.

Respectfully submitted,

MARKOWITZ & KREVSKY P.C.

By: _____

Lawrence S. Markowitz, Esquire

Attorney for Plaintiff

208 E. Market St., P.O. Box 392

York PA 17405-0392

(717) 843-2876

Supreme Ct. I.D. #41072

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICHARD C. WOJEWODZKI

: No. 1:CV 01-285

v.

: (Judge Rambo) : Civil Action

CONSOLIDATED FREIGHTWAYS, INC.

: Jury Trial Demanded

CERTIFICATE OF CONCURRENCE

I, Lawrence S. Markowitz, Esquire, the attorney for the Plaintiff hereby certifies that I sought and received the concurrence of Vincent Candiello, Esquire, the attorney for the Defendant in the foregoing Motion for Extension of Time.

MARKOWITZ & KREVSKY P.C.

By:

Lawrence S. Markowitz, Esquire

Attorney for Plaintiff

208 East Market St., P.O.Box 392

York Pa 17405-0392

(717) 843-2876

Supreme Ct. I.D. #41072

CERTIFICATE OF SERVICE

AND NOW, TO WIT, this 11th of March, 2002, I, Lawrence S. Markowitz, Esquire, hereby certify that I have this date served a copy of the foregoing Motion for Extension of Time by depositing a copy of same in the United States Mail, postage prepaid at York, Pennsylvania, addressed to counsel of record as follows:

Vincent Candiello, Esquire G. Scott Paterno Morgan, Lewis & Bockius LLP 417 Walnut Street Harrisburg PA 17101

Respectfully submitted,

MARKOWITZ & KREVSKY P.C.

By:_

Lawrence S. Markowitz, Esquire Attorney for Plaintiff 208 E. Market St., P.O.Box 392 York Pa 17405-0392

(717) 843-2876

Supreme Ct. I.D. #41072